



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

March 17, 2021

Request to Be Filed Under Seal

BY ECF/Email

The Honorable Mary Kay Vyskocil
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl St.
New York, NY 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 3/17/2021
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Re: United States v. Palmer, 20 Cr. 379 (MKV)

Dear Judge Vyskocil:

The defense has requested that the Government file a redacted version of its March 15, 2021 opposition brief (Doc. No. 54), with the unredacted brief to be maintained under seal, [REDACTED]

The Government has no objection to that request, [REDACTED]

[REDACTED] The redactions at issue—which the Government has emailed to chambers—are very limited and will not impair the public's ability to understand most of the arguments advanced in the Government's opposition brief. Accordingly, the Government respectfully seeks the Court's leave to file a redacted version of the brief on ECF and to accept the previously filed brief under seal.

In marking the proposed redactions, the Government discovered a typographical error as to a date on page 13 of the brief: "August 27, 2019" should read "August 22, 2019." In the event the Court permits the Government to file a redacted brief, the Government respectfully requests leave to make this correction. Defense counsel does not object.

Finally, the Government respectfully requests leave to file this letter in redacted form on ECF [REDACTED]

Respectfully submitted,

AUDREY STRAUSS
United States Attorney for the
Southern District of New York

by: /s/ Jun Xiang
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CC
John Meringolo, Esq. (By ECF/Email)

The Court GRANTS the Government leave to file the redacted version of the opposition brief on ECF and to correct the typographical error in the brief described above.

Unredacted versions of this letter and the opposition brief shall be kept under seal.

SO ORDERED.

Date: 3/17/2021
New York, New York


Mary Kay Vyskocil
United States District Judge